

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;  
PLAINTIFF JOSEPHINE; PLAINTIFF SARA;  
PLAINTIFF ALYAS; PLAINTIFF MARCOS;  
PLAINTIFF AHMED; PLAINTIFF RACHEL;  
PLAINTIFF ALI; HIAS, INC.; CHURCH  
WORLD SERVICE, INC.; and LUTHERAN  
COMMUNITY SERVICES NORTHWEST,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; MARCO RUBIO,  
in his official capacity as Secretary of State;  
KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security; ROBERT F.  
KENNEDY, JR., in his official capacity as  
Secretary of Health and Human Services,

*Defendants.*

Case No. 2:25-cv-255-JNW

**DECLARATION OF MEGAN M.  
HAUPTMAN IN SUPPORT OF  
PLAINTIFFS' MOTION TO  
ENFORCE THE FIRST  
PRELIMINARY INJUNCTION  
AND EMERGENCY MOTION FOR  
SHOW CAUSE HEARING**

I, Megan M. Hauptman, hereby declare as follows:

1. I am over the age of eighteen and competent to make this declaration. I am an attorney with the International Refugee Assistance Project (IRAP) and counsel for Plaintiffs in the above-captioned matter. I make this declaration based on personal knowledge about which I am competent to testify.

DECL. OF MEGAN M. HAUPTMAN  
(No. 2:25-cv-255-JNW)

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1           2.       On March 27, 2025, counsel for Plaintiffs emailed counsel for Defendants  
2 requesting an update by April 1 as to steps taken to implement the first preliminary injunction in  
3 this matter, including updates as to case progress for each of the individual Plaintiffs. As of the  
4 execution of this declaration, Defendants' counsel has not provided a substantive response.

5           3.       I further submit this declaration to provide the Court true and correct copies of  
6 certain documents submitted in support of Plaintiffs' motion to enforce the first preliminary  
7 injunction:

8           **Exhibit 1** is a true and correct copy of the document titled "Refugees: 2023." The report  
9 was downloaded at my direction on April 3, 2025, and is available on the Office of Homeland  
10 Security Statistics website at [https://ohss.dhs.gov/sites/default/files/2024-11/2024\\_1108\\_ohss\\_](https://ohss.dhs.gov/sites/default/files/2024-11/2024_1108_ohss_refugee_annual_flow_report_2023.pdf)  
11 [refugee\\_annual\\_flow\\_report\\_2023.pdf](https://ohss.dhs.gov/sites/default/files/2024-11/2024_1108_ohss_refugee_annual_flow_report_2023.pdf).

12           **Exhibit 2** is a true and correct copy of the declaration of Katherine Rehberg, dated April 3,  
13 2025.

14           **Exhibit 3** is a true and correct screen capture of the article titled "Mission South Africa:  
15 How Trump is Offering White Afrikaners Refugee Status." This article was captured at my  
16 direction on April 3, 2025, and is available on the *New York Times* website at [https://](https://www.nytimes.com/2025/03/30/us/politics/trump-south-africa-white-afrikaners-refugee.html)  
17 [www.nytimes.com/2025/03/30/us/politics/trump-south-africa-white-afrikaners-refugee.html](https://www.nytimes.com/2025/03/30/us/politics/trump-south-africa-white-afrikaners-refugee.html).

18           **Exhibit 4** is a true and correct copy of the declaration of Plaintiff Ahmed, dated April 2,  
19 2025, with attachments.

20           **Exhibit 5** is a true and correct copy of the declaration of Plaintiff Sara, dated April 1, 2025.

21           **Exhibit 6** is a true and correct copy of the declaration of Plaintiff Alyas, dated April 3,  
22 2025.

23           **Exhibit 7** is a true and correct copy of the declaration of Plaintiff Pacito, dated April 3,  
24 2025.

25           **Exhibit 8** is a true and correct copy of the declaration of Plaintiff Marcos, dated April 1,  
26 2025.

**Exhibit 9** is a true and correct copy of an email received by attorney Maura Heron from the Resettlement Support Center (RSC) for Latin America, dated March 24, 2025, titled “Automatic reply: Question about CAM refugees in Honduras.” This email was received by IRAP from attorney Heron.

**Exhibit 10** is a true and correct copy of an email received by an IRAP staff member from the RSC for the Middle East and North Africa, dated March 27, 2025, titled “Automatic Reply: P2 DAP travel ready cases.”

**Exhibit 11** is a true and correct copy of an email received by attorney Angie Plummer from the U.S. Embassy Paris on behalf of a follow-to-join (FTJ) petitioner with an FTJ petition approved by U.S. Citizenship and Immigration Services, subsequent to the FTJ beneficiary's interview, dated April 3, 2025, titled "Re: From the U.S. Embassy Paris -- [REDACTED] - V93 – Additional information needed." This email was received by IRAP from attorney Plummer.

\* \* \*

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED this 3rd day of April, 2025, at Arlington, Virginia.

s/ Megan M. Hauptman  
Megan M. Hauptman